

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: CRUDE OIL COMMODITY
FUTURES LITIGATION

MASTER FILE NO. 1:11-cv-03600-KBF

This Document Relates To: ALL ACTIONS

**PLAINTIFFS' MEMORANDUM IN SUPPORT OF MOTION FOR SUBSTITUTION
OF INTERIM CO-LEAD CLASS COUNSEL**

Plaintiffs submit this memorandum in support of their motion to amend the February 14, 2014 Memorandum and Order (Docket No. 9) appointing interim class counsel by substituting the firm of Burns Charest LLP for Susman Godfrey LLP as Interim Co-Lead Class Counsel for Plaintiffs in the above-captioned matter.

Since the inception of this case, Warren T. Burns and Daniel Charest have been the attorneys at Susman Godfrey LLP with the principal responsibility of managing this case. In particular, Burns has appeared and argued at every hearing, managed the appeal and argument concerning third-party productions, and coordinated settlement discussions. Burns and Charest have left Susman Godfrey and are now associated with Burns Charest.

Burns Charest has the full financial capability of serving as Interim Co-Lead Class Counsel in this litigation. Burns Charest likewise has the requisite expertise and institutional knowledge given that the attorneys who principally prosecuted this litigation at Susman Godfrey are now at Burns Charest.

Plaintiffs' interim co-lead counsel, Lovell Stewart Halebian Jacobson LLP, supports this motion, as do Defendants. Further, Susman Godfrey likewise supports this motion.

Accordingly, for the reasons set forth above, Plaintiffs respectfully submit that the Memorandum and Order appointing interim class counsel should be amended to substitute Burns Charest for Susman Godfrey as Interim Co- Lead Class Counsel for End-Payor Plaintiffs.

Dated: May 22, 2015

Respectfully submitted,

/s/ Warren T. Burns

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Proposed Interim Co-Lead Counsel

CERTIFICATE OF SERVICE

This is to certify that on May 22, 2015, a true and correct copy of the foregoing instrument was filed with the United States District Court for the Southern District of New York via the Court's CM/ECF system, thereby causing copies to be electronically served upon all counsel of record.

/s/ Warren T. Burns

Warren T. Burns